

1 Vanessa R. Waldref
2 United States Attorney
Eastern District of Washington
3 Todd M. Swensen
4 Assistant United States Attorney
402 E. Yakima Avenue, Suite 210
5 Yakima, Washington 98901
6 (509) 454-4425

7 IN THE UNITED STATES DISTRICT COURT
8 EASTERN DISTRICT OF WASHINGTON

9 UNITED STATES OF AMERICA,

1:22-CR-02007-MKD-1

10
11 Plaintiff,

UNITED STATES' SENTENCING
MEMORANDUM

12 v.

13 PAUL LAWRENCE SYLVESTER,

14
15 Defendant.

16
17 The United States of America, by and through Vanessa R. Waldref,
18 United States Attorney for the Eastern District of Washington, and Todd M.
19 Swensen, Assistant United States Attorney, submits the following United States'
20 Sentencing Memorandum:
21

22 **I. Offense Level & Criminal History:**
23

24 The United States concurs with the Presentence Investigation Report
25 (PSR) that the base offense level here is 26 and Total Offense Level calculation
26
27
28

1 of 21. The United States also concurs with Probation's assessment of
2 Defendant's criminal history category of III.

3 **II. Departures:**

4 The United States has not identified any downward and/or upward
5 departures warranted under the Guidelines.
6

7 **III. 18 U.S.C. § 3553(a):**

8 The United States has no Section 3553(a) information beyond what is
9 included in the PSR. The United States believes that guideline range detailed in
10 the PSR is a sufficient sentence, but not greater than necessary to comply with the
11 purposes of 18 U.S.C. § 3553.
12

13
14 Based on the information above, the United States will request a 33-month
15 prison sentence to be followed by 5 years of supervised release.
16

17 DATED this 23rd day of January 2024.

18 VANESSA R. WALDREF
19 United States Attorney

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21 TODD M. SWENSEN
22 Assistant United States Attorney

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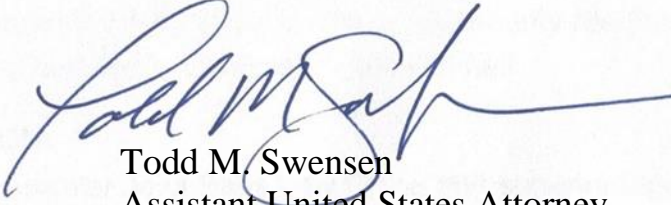
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CERTIFICATE OF SERVICE

I hereby certify that on January 23, 2024, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF System, and a copy was emailed to the counsel of record in this case: Robert Flenbaugh.

A handwritten signature in blue ink, appearing to read "Todd M. Swensen", is positioned above the printed name and title.

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